

7000 SOUTH WEST ADAMS STREET, PEORIA, IL 61641 (309) 697-7020

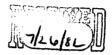
US EPA RECORDS CENTER REGION 5



RECEIVED

JUL 1 9 1982

June 28, 1982



WASTE MANAGEMENT BRANCH EPA, REGION V

Mr. James Brossman Waste Management Branch - Region V United States Environmental Protection Agency 111 West Jackson Blvd. Chicago, Illinois 60604

Re: 5HW-TUB, RCRA Activities, ID #ILD000714881

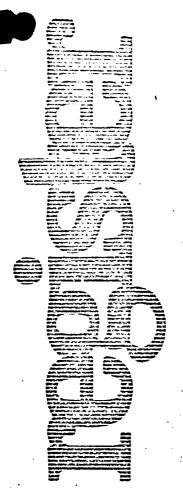
Dear Mr. Brossman:

In accordance with our phone conversation of June 22, 1982, this letter is our formal request for withdrawing our Part A Hazardous Waste Permit for owning and operating a Hazardous Waste Management Facility.

Keystone originally filed for a hazardous waste treatment and storage permit due to the unknown problems that could have arisen regarding off-site disposal of our hazardous waste. We have not had any undue problems disposing of our hazardous waste off site and also have tested our #K063 waste water treatment plant sludge and found it to be non-hazardous.

We then petitioned the USEPA to have our #K063 sludge delisted with the USEPA approving our petition in the August 6, 1981, issue of the Federal Register (copies attached of pp 40154, 40157, 40158). In addition to this delisting action, the USEPA has now removed the #K063 sludge from its hazardous waste list. Our waste water treatment facility operates under NPDES Permit #IL0002526 and meets all federal and state discharge requirements.

June 28, 1982 Mr. James Brossman For the reasons on page 1, Keystone believes that it is exempt from the hazardous waste RCRA Part 265 regulations and formally withdraws its Part A - Hazardous Waste Management Permit (Application date 11/14/80, USEPA Part A approval date 4/14/82). Very truly yours, Approved: Dale L. Bennington R. Owens President Manager, Energy & Environmental Engineering, Bartonville Plant Bartonville Plant DLB/nle Enclosures IEPA - RCRA Activities, Land Pollution Control J. W. Mahannah J. J. Monroe



Thursday August 6, 1981



## Environmental Protection Agency

Hazardous Waste Management System; Identification and Listing of Hazardous

> Photocopy or Keystone-Bartonville Plant Delisting of #K063 studge us a HAZARDOUS WASTE

Bennington 6/25/2



ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 261

[SWH-FRL-1891-1]

Hazardous Waste Management System: Identification and Listing of Hazardous Waste

AGENCY: Environmental Protection Agency.

ACTION: Grant of temporary exclusions and request for comment.

SUMMARY: The Environmental Protection Agency (EPA) is today temporarily excluding solid wastes generated at several particular generating facilities from the lists of hazardous waste contained in 40 CFR 261.31 and 261.32. This action responds to delisting petitions submitted under 40 CFR 260.20, (which allows any person to petition the Administrator to modify or revoke any provisions of Part 260 through 265 of the Resource Conservation and Recovery Act Regulations), and §260.22, which specifically provides the generators the opportunity to petition the Administrator to exclude waste on a "cite specific" basis from the hazardous waste list, and gives the Administrator the authority to grant temporary exclusions from the hazardous waste list when there is a substantial likelihood that a final exclusion will be granted. The effect of this action is to temporarily exclude certain hazardous wastes generated at particular facilities from listing as hazardous waste under 40 CFR

DATES: Effective date: August 6, 1981.

EPA will accept public comments on these temporary exclusions until

October 5, 1981. Any person may request a hearing on these temporary exclusions by filing a request with John P. Lehman, whose address appears below, by August 27, 1981. The request must contain the information prescribed in 40 CFR 260.20(d).

ADDRESSES: Comments should be sent to the Docket Clerk, Office of Solid Waste (WH-565), U.S. Environmental Protection Agency, 401 M Street SW., Washington, D.C. 20460.
Communications should identify the regulatory docket number "Section 3001/Delisting Petitions."

Requests for hearing should be addressed to John P. Lehman, Director, Hazardous and Industrial Waste Division, Office of Solid Waste (WII-565), U.S. Environmental Protection Agency, Washington, D.C. 20460.

The public docket for these temporary exclusions is located in Room 2711, U.S.

FOR FURTHER INFORMATION CONTACT: Myles Morse, Office of Solid Waste (WH-565), U.S. Environmental Protection Agency, 401 M St. SW., Washington, D.C. (202) 755-9187. SUPPLEMENTARY INFORMATION: On January 16, 1981, as part of its final and interim final regulations implementing Section 3001 of RCRA, EPA published an amended list of hazardous wastes from non-specific and from specific sources. See 40 CFR 261.31 and 261.32 (46 FR 4614). These wastes were listed as hazardous because they typically and frequently exhibit the characteristics of hazardous wastes identified in Subpart C of Part 261 (ignitability, corrosivity, reactivity and EP toxicity) or meet the criteria for listing contained in §§ 261.11(a)(2) or 261.11(a)(3).

The Agency, however, recognizes that individual waste streams may vary depending on raw materials, industrial processes and other factors. Thus, while a type of waste described in these regulations generally is hazardous, a specific waste meeting the listing description from an individual facility may not be. For this reason, §§ 260.20 and 260.22 provide an exclusion procedure, allowing persons to demonstrate that a specific waste from a particular generating facility should not be regulated as a listed hazardous waste. To be excluded, petitioners must show that the waste produced at their facilities does not meet any of the relevant criteria under which the waste was listed. (See § 260.22(a) and Background Documents for listed wastes.) Wastes which are "delisted" (i.e., excluded from listing in Part 261, Subpart D) may, however, still be hazardous if they exhibit any of the characteristics of a hazardous waste in Part 261, Subpart C, and generators remain obligated to make this determination.

In addition to wastes listed as hazardous in §§ 261.31 and 261.32, residues from the treatment, storage, or disposal of listed hazardous wastes also are eligible for exclusion and remain hazardous wastes until excluded. (See §§ 261.3 (c) and (d)(2).) Again, the substantive standard for "delisting" is that the waste not meet any of the criteria for which the waste was listed originally. Where the waste is derived from one or more listed hazardous wastes, the demonstration may be made with respect to each constituent listed waste, or the waste mixture as a whole.

wastes, excluded hazardous waste treatment, storage or disposal residues remain subject to Subpart C of Part 261, and so may be hazardous if they exhibit any of the characteristics of hazardous waste.

EPA recognizes as well that there will be circumstances where immediate action on petitions is appropriate. Therefore, upon Agency review of a submitted petition, the Administrator may under § 260.22(m) grant a temporary exclusion if there is substantial likelihood that an exclusion will finally be granted.

It should be noted that the Agency has not yet run spot checks on the test data submitted to date in exclusion petitions. The Agency believes that the sworn affidavits submitted with each petition sufficiently binds the petitioners to ensure presentation of truthful and accurate test results. The Agency may, however, spot sample and analyze wastes or groundwater before a final decision is made whether to exclude any particular waste from the hazardous waste lists.

We also note that the temporary exclusions granted today apply only to the Federal hazardous waste management system established under RCRA. States remain free to take any action they deem appropriate with regard to these wastes.

The temporary exclusions published today involve the following petitioners: International Minerals Chemical Corporation, Terre Haute, Indiana; Timken Company, Canton, Ohio; General Electric, Mattoon, Illinois; Whirlpool Corporation, Fort Smith, Arkansas; Great Lakes Steel, Detroit, Michigan; Whirlpool Corporation, Danville, Kentucky; Crosman Air Guns, Fairport, and East Bloomfield. New York; the Keystone Group, Bartonville, Illinois; Mansfield Products Company. Mansfield, Ohio; Gould Inc., Spartanburg, South Carolina; General Battery Corporation, Reading, Pennsylvania; Maytag Company. Newton, Iowa; Whirlpool Corporation, Marion, Ohio; Talon, Division of Textron, Meadville, Pennsylvania: Bentley Nevada Corporation, Minden. Nevada: Peerless Chain Company. Winona, Minnesota; Whirlpool Corporation, Findlay, Ohio; Mearl Corporation, Peekskill, New York: Industrial Liquids Recycling Inc., Mount Pleasant, Tennessee; Empire-Detroit Steel Division/Cyclops Corporation. Dover, Ohio; Hamblet and Hayes Co., Salem, Massachusetts; and Chem-Clear Inc., Cleveland, Ohio.

Edicated with tin, zinc and aluminum, for lating on carbon steel; and (0) chemical etching and milling of aluminum.

Whirlpool has peritioned to delist its waste because it does not meet the criteria for which it was listed.

Whirlpool claims that the production processes which generate the waste do not use cadmium, hexavalent chromium, nickel, or cyanide, the constituents for which the waste is listed. They therefore claim that their treated wastewater sludge is non-hazardous due to the absence of these constituents in the sludge. They also claim that any other toxic compounds used in their process are removed from the sludge by the treatment process.

Whirlpool has submitted a detailed description of its waste treatment system, EP toxicity test results for cadmium, total chromium and nickel, and constituent analyses of the sludge for these metals and cyanide. Samples were obtained over a seven month period which the petitioner claims to be representative of any variation of the constituent concentration in the waste. The treatment system involves lime/alum neutralization, flocculation, clarification, and vacuum filtration.

Constituent analyses of the final treatment sludge revealed cadmium, total chromium, nickel and free cyanide concentrations of 0.35, 118, 8.3, and 0.187 ppm, respectively. EP toxicity tests involving cadmium, total chromium and nickel produced maximum leachate levels of <.020, 1.01, and 2.66 ppm, respectively.

### B. Agency Analyses and Action

Whirlpool has demonstrated that its waste treatment system produces a nonhazardous sludge. Whirlpool claims that its production process does not use cadmium, hexavalent chromium, nickel or cyanide. Low concentrations of cadmium, nickel and cyanide are present in the waste; their occurrence probably results from unknown minor sources of contamination and background levels, rather than from the direct use of these constituents in the plating processing. In addition, the EP extract concentration for cadmium is well below the maximum EP toxicity limit for this constituent while that for nickel is not considered to be of regulatory concern.

With respect to hexavalent chromium, the petitioner claimed that hexavalent chromium was not used in the process, but provided no analytical data to support their case (i.e., analysis of sludge for hexavalent chromium). However, since the EP extract

concentration for total chromium is well below the maximum EP toxicity limit for this constituent, the Agency has not asked the petitioner to provide any additional data. The Agency, therefore, has granted a temporary exclusion to the Whirlpool Corporation facility in Danville, Kentucky, for its treated electroplating sludge, as described in its petition.

## VII. Crosman Air Guns

### A. Petition for Exclusion

Crosman Air Guns, located in East Bloomfield and Fairport, New York, (Crosman), involved in the production of BB and pellet guns, has petitioned the Agency to exclude its residue generated from the treatment of EPA Hazardous Waste No. K062-Spent pickle liquor from steel finishing operations; and its wastewater treatment sludge, presently listed as EPA Hazardous Waste No. F006-Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping. associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum. Crosman has petitioned to exclude its waste because it does not meet the criteria for which these wastes were listed.

The production processes which generate the waste at Crosman include zinc castings deburring, zinc plating on carbon steel, black oxide bluing and copper coating processes. The zinc plating process involves acid pickling of the metal prior to plating. Crosman claims that the treated wastewater sludge it generates is non-hazardous due to the effectiveness of its treatment system.

Crosman has submitted a detailed description of its waste treatment system; EP toxicity test results for cadmium, lead, total chromium and nickel; and constituent analyses of the sludge for cyanide. Samples were obtained over a six month period which the petitioner claims to be representative of any variation of constituent concentration in the waste.

The treatment system process for the spent pickle liquor, the cleaning bath solutions, and the rinsewater over-flow wastes involves pH adjustment with either caustic soda or sulfuric acid, flocculation, settling, and sludge dewatering. EP toxicity tests involving

mium, total chromium, lead and nickel produced maximum leachate levels of .03, .05, <.2 and .06 ppm. respectively. Cyanide was not detected in the samples.

## B. Agency Analysis and Action

Crosman has demonstrated that its waste treatment system produces a nonhazardous sludge. The EP extract concentrations for cadmium and total chromium are all below the national interim primary drinking water standards for these constituents while that for lead is well below the maximum EP toxicity limits. Cyanide was not detected in the sludge. The nickel leachate concentrate is not considered to be of regulatory concern. These low leachate levels indicate that the constituents are present in essentially an immobile form. The Agency, therefore, has granted a temporary exclusion to Crosman Air Gun facilities at Fairport and East Bloomfield, New York, for its treated electroplating sludge and its treated spent pickle liquor, as described in its petition.

## VIII. The Keystone Group

#### A. Petition for Exclusion

The Keystone Group—Bartonville Plant (Keystone), involved in the manufacture of steel, wire and wire products, has petitioned the Agency to exclude its sludge, formerly listed as EPA Hazardous Waste No. K063 (sludge from lime treatment of spent pickle from steel finishing operations). Keystone has petitioned to exclude its waste because it does not meet the criteria for which the waste was originally listed.

Keystone utilizes the processes of cold drawing, acid pickling and lime treatment, sodium hydroxide degreasing and etching in the production of wire from carbon steel wire rods. Its waste treatment process for spent pickle liquor involves neutralization, lime and polymer flocculation, settling, and sludge lagoon dewatering. They claim their sludge is environmentally stable and non-hazardous, and specifically that the sludge does not contain hazardous levels of hexavalent chromium and lead, the constituents of concern for which the spent pickle liquor (K062) is listed.

Keystone submitted a detailed description of their sludge treatment system, and EP toxicity test results for all toxic constituents specified in § 261.24 of the regulations. The samples were taken over a one month period which the petitioner claims to be representative of any variation of

See Footnote 2.

See Footnote 2.

See Footnote 1.

Enstituent concentration in the waste EP toxicity tests revealed maximum total chromium and lead levels in the waste extract of 0.05 and 0.45 ppm. respectively.

## B. Agency Analysis and Action

The constituents of concern in this waste are hexavalent chromium and lead. EP extracts from sludge samples analyzed by Keystone show lead and total chromium consistently well below the maximum EP toxicity limits." These low leachate levels indicate that the constituents are present in essentially an immobile form. A final pH of 8.3 indicates that Keystone's waste treatment process effectively neutralizes its spent pickle liquor wastes. The Agency, therefore, has granted a temporary exclusion to the Keystone Group's facility in Bartonville, Illinois, for its treated spent pickle liquor, as described in its petition.

## 1X. Mansfield Products Company

#### A. Petition for Exclusion

Mansfield Products Company (Mansfield), Mansfield, Ohio, involved in the manufacture of washers, dryers, ranges, and dry cleaning machines, has petitioned the Agency to exclude its treated sludge presently listed as EPA Hazardous Waste No. F006-Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc aluminum plating on carbon steel: (5) cleaning/stripping associated with tin. zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum. The production processes at Mansfield Products which generate the listed hazardous wastes are nickel plating and chromate conversion coating. Mansfield Products has petitioned to exclude its waste because it does not meet the criteria for which it was listed.

Mansfield has submitted a description of its electroplating and wastewater treatment processes, and EP toxicity test results for cadmium, total chromium, and nickel, and a constituent analysis for cyanide.

Mansfield's treatment process involves the batch reduction of chromic rinse waste, lime and polymer neutralization and flocculation, clarification, and vacuum filtration dewatering. Samples were collected over a 2 month period which the petitioner claims to be representative of

by variation of constituent concentration in the waste. EP toxicity tests involving cadmium, total chromium and nickel produced maximum leachate levels of <0.1, 0.1 and 12.8 ppm, respectively. Total constituent analysis for cyanide was of 5.0 ppm.

## B. Agency Analysis and Action

The constituents for which EPA Hazardous Waste No. F006 are listed are cadmium, hexavolent chromium, nickel and cyanide. EP extracts show cadmium and total chromium well below the EP toxicity limits. <sup>10</sup> Nickel extract values are also not considered to be regulatory concern. <sup>11</sup> The reported cyanide levels are not considered to be of regulatory concern. The Agency, therefore, has granted a temporary exclusion to Mansfield Product's facility in Mansfield, Ohio, for its treated wastes, as described in its petition.

## X. Gould Incorporated

## A. Petition for Exclusion

Gould Incorporated (Gould), involved in the manufacturing of electrical busses, has petitioned the Agency to exclude its wastewater treatment sludge presently listed as EPA Hazardous Waste No. F006-Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum: (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel: (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/ stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum. Gould has petitioned to exclude its waste because it does not meet the criteria for which it was listed.

Gould's electropiating processes use copper and silver; cadmium, chromium and nickel are claimed not to be used in any of Gould's processes. Production processes used at Gould include nitric acid stripping, copper bright dip, bronze strike, copper plating, silver strike and silver plating. Cyanides are used in these processes, and Gould's treatment

equalization, neutralization, caustic precipitation, clarification, lagooned storage, and plate and frame liltration.

Gould has submitted a description of its wastewater treatment process; EP toxicity test results for cadmium, total chromium, nickel, and cyanide; and total constituent analyses of the sludge for cadmium, total chromium, nickel, and free cyanide.

EP toxicity tests for cadmium, total chromium, and nickel produced maximum leachate concentrations of <0.01, <0.05, 0.26 ppm, respectively. Distilled water leachate tests for cyanide produced a maximum level of 0.059 ppm. Constituent analyses of the wastewater sludge indicated maximum cadmium, total chromium, and cyanide concentrations of 5.4, 56.0 and 118 ppm, respectively.

#### B. Agency Analysis and Action

The constituents for which EPA Hazardous Waste No. F006 are listed are cadmium, hexavalent chromium. nickel and cyanide. Gould has demonstrated that its copper, bronze and silver plating operations do not involve the use of cadmium or chromium. The low concentrations of cadmium and chromium in the sludge are probably a result from unknown minor sources of contamination rather than from the direct use of these constituents in the plating process. In addition, EP extracts show cadmium and total chromium 12 levels consistently below the interim primary drinking water standard. With respect to nickel. the petitioner did not provide any specific analysis for nickel in the sludge and therefore, the Agency has no data to support their claims. However, since the level of nickel in the EP extract is not considered to be of regulatory concern. the Agency has not asked the petitioner to provide any additional data. Finally. the level of free cyanide in the dewatered sludge is considered negligible and is therefore, not of regulatory concern.

The concentration of total complexed cyanides, however, is of concern to the Agency. The Agency has data indicating that complexed cyanides if exposed to sunlight may photodecompose to free cyanide (see background documents for EPA Hazardous Wastes F006 and K086). Gould has requested to empty their lagoon, and dispose of the sludge at a landfill. Gould has also requested to continue using their lagoon (after it is emptied) for sludge placement. The Agency is not presently at a point where

<sup>\*</sup>See Footnote 2.

<sup>10</sup> See footnote 2.

<sup>13</sup> In the previous set of delisting petitions which were published in the Federal Register (46 FR 17196 March 18, 1981), the Agency had published an interim nickel leachate level of 10 ppm in considering petitions for exclusion. However, after consideration of additional nickel toxicity data, the Agency is amending the allowable nickel leachate level from 10 ppm to 20 ppm. By doing this, the Agency now believes that in most cases, the concentration of nickel in the waste extract at less than 20 ppm would not be of regulatory concern. This new level is based in part on the Agency's revealuation of the nickel water quality criterion value, with an upward multiplier allowing for some attenuation and dilution of the contaminant.

<sup>&</sup>quot;See Foolnote 2.



7000 SOUTH WEST ADAMS STREET, PEORIA, IL 61641 (309) 697-7020

August 15, 1980

Mr. Y. J. Kim U.S. EPA - Region V RCRA Activities P. O. Box 7861 Chicago, IL 60680

Dear Mr. Kim:

Enclosed are completed Notification of Hazardous Waste Activity Forms 8700-12 for our three Keystone Group plants in Region V - Peoria Plant, Chicago Plant and Crawfordsville Plant.

For our Keystone Group Chicago and Crawfordsville plants, the preprinted label with the installation identification number was not received so the I.D. number was not entered on the forms.

We received the preprinted labels and I.D. number for the corporation - Keystone Consolidated Industries, Inc. (ILD990817892). As the corporation has many separate plants, I assigned this number to our Peoria Plant only.

If you need additional information, please call me at 309/697-7552.

Very truly yours,

DALE L. BENNINGTON, P.E.

MANAGER, ENVIRONMENTAL ENGINEERING

DLB:bmk

Enclosure(s)

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C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code~104"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

CODE ''T04'':

Keystone generates approximately 10,000 gallons/day of waste pickle liquor (K062). The K062 waste mixed with all other plant waste streams is pumped to the Waste Water Treatment Plant (WWTP). The WWTP has a design capacity of approximately twice (20,000 gal./day) that which is used. The acidic waste water is pre-neutralized to raise the pH to 5 or greater. This waste water is then lime neutralized and the solids precipitate out in the sedimentation basins. The sludge (K063) is pumped to our sludge storage lagoons.

## IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpert D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each cheracteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
POUNDSP	KILOGRAMS	K
TONS	METRIC TONS	. М

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code/s/.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hezardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual

quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter 'included with above" and make no other entries on that line.

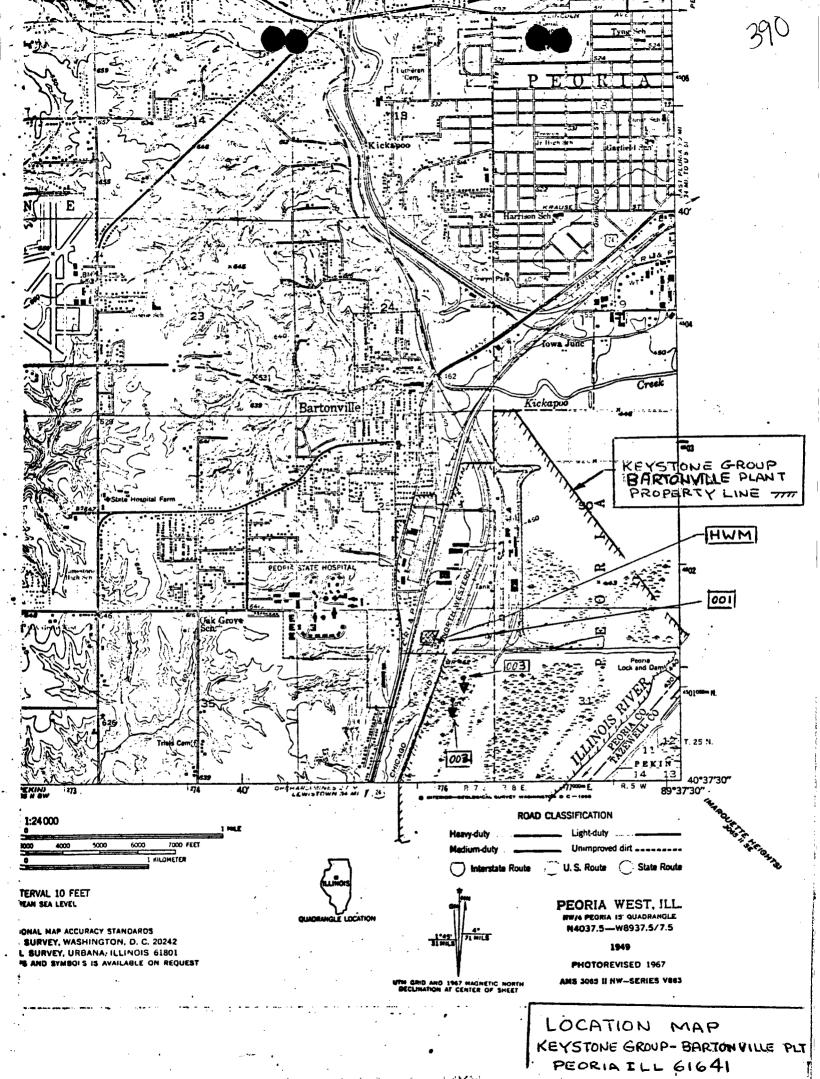
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hezardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	1	Α. Ι							UN			-								11	C	D. PROCESSES
LINE NO	MAZARD, R ESTIMATED ANN			NUAL ASTE	OF MEA- SURE (enter code)			1. PROCESS CODES (enter)					ODE	s	4.		2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$ )					
X-1	K	o	5	4	900				P		T	0	3	D	8	0	I			1-1		
X-2	D	0	0	2	400				P		T	0	3	D	8	0		1		1.1°		
X-3	D	0	0	1	100				P		T	0	3	$D^{'}$	8	0	ı	1		TT		
X-4	D	0	0	2											1	,	I.	,		11		included with above

Consinued from page 2. NOTE: Photocopy this page before completing in more than 26 wastes to list.  FOR OFFICIAL USE ONL:																
		,	Γ		BER (enter from page 1)		/ /	旦	,	Y		****		IAL	JSE	T/AC
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IV. I	T		EP/		ON OF HAZARDOUS WASTE	c.	UNIT	nued	/>							D. PROCESSES
LUNE NO.	H A W A (er	47	ΔR	D. 10. <i>le)</i>	B. ESTIMATED ANNUAL QUANTITY OF WASTE	(e c	MEA- URE enter ode)			. I. PR	(en	ter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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2	K	0	6	2	15,000		T	Τ (	) 4		т		<del>- 1</del>	-	1	lime neutralization & precipitati
3	K	0	6	3	15,000	-	T	Τ (	) 2	D 8	3	-		-		
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5			ļ Ļ					-	-	-	<del>-</del>		Т'	-	-	
6			_				+	1		+		-	T	<del>                                     </del>	<del>-1</del> ·	
8							-	-	<u> </u>	1	Т	<del>                                     </del>		+	<del>-</del> T	
9								1	<del></del>	<del>                                     </del>	<del></del>	-	7	<del> </del>	-1	
10							+		<del>-</del>	-	<del></del>	1		-	<del></del>	
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Continued from the front,		
	ntinued)	
E. USE THIS SPACE TO LIST ADDITION TO	CESS CODES FROM ITEM D(1) ON PAGE 3.	
		,
1		
EPA I.D. NO. (Entergrow page 1).		
FILD 6 9 0 8 1 7 8 9 2 6		
V. FACILITY DRAWING		
	age 5 a scale drawing of the facility (see instructions for more	detail).
VI. PHOTOGRAPHS		
All existing facilities must include photographs (aeric	or ground—level) that clearly delineate all existing st	ructures; existing storage,
	ige, treatment or disposal areas (see instructions for m	ore detail).
VII. FACILITY GEOGRAPHIC LOCATION  LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees	wingston & manufal
	Zondi de la constitue de la co	, minutes, & seconds
4 0 3 8 0 0	8 9 3 72 - 74 7	
VIII. FACILITY OWNER		
A. If the facility owner is also the facility operator as I skip to Section IX below.	sted in Section VIII on Form 1, "General Information", place	an "X" in the box to the left and
B. If the facility owner is not the facility operator as in	ted in Section VIII on Form 1, complete the following items	
1. NAME OF FACIL	TY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E Keystone Consolidated Industries,	Inc. Keystone Group, A Division of	3 0 9 -6 9 7 -7 0 2 0
19 J16 3. STREET OR P.O. BOX		58   66 - 58   59 - 61   62 - 6 5. ST.   6. ZIP CODE
F 7000 South Adams	G Peoria	IL 61641
15 16	45 15 16 - 40	
IX. OWNER CERTIFICATION		
	xamined and am familiar with the information submit dividuals immediately responsible for obtaining the in	
submitted information is true, accurate, and complet	e. I am aware that there are significant penalties for su	
including the possibility of fine and imprisonment.		
A. NAME (print or type) Nicholas R. Owens	B. SIGNATURE	C. DATE SIGNED
Keystone Group-V.P. of Manufacturin	In Vicholas R. Owens	11-14-80
X, OPERATOR CERTIFICATION	reading 11, shows	11-14-00
	xamined and am familiar with the information submit	ted in this and all attached
documents, and that based on my inquiry of those in	dividuals immediately responsible for obtaining the in	formation, I believe that the
submitted infolmation is frue, accurate, and complet including the possibility of fine and imprisonment.	e. I am aware that there are significant penalties for su	bmitting false information,
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
رموره ده دستور	S. S. SHATORE	C. DATE SIGNED





7000 SOUTH WEST ADAMS STREET, PEORIA, IL 61641 (309) 697-7020

May 6, 1981

Ms. Jacqui Sales WH565 Office of Solid Waste Hazardous & Industrial Waste Division United States Environmental Protection Agency 401 M. Street S.W. Washington, D.C. 20460

RE: 2/13/81 PETITION TO DELIST KEYSTONE - BARTONVILLE PLANT WASTE WATER TREATMENT SLUDGE AS A HAZARDOUS WASTE (#K063).

Dear Ms. Sales:

In accordance with our phone conversation on March 13, 1981; I have had four additional sludge samples collected and analyzed for EP toxicity by Daily Analytical Laboratories. These four samples (#1089-02,-03,-04 and -05) were collected on March 30, 1981.

Attached is the original of Daily's lab report dated April 29, 1981 and a copy of the associated Daily cover letter to me dated May 1, 1981.

The results show that the EP leachate levels of lead and chromium are consistent and well below the levels that would make the sludge a hazardous waste. The level of hexavalent chrome is also extremely low.

I hope that this additional data on sludge EP toxicity will be sufficient for you to grant us delisting of this sludge as a hazardous waste.

Very truly yours,

IRREG. SUB. NOT.

DALE L. BENNINGTON, P.E.

MANAGER, ENVIRONMENTAL ENGINEERING

DLB: bmk

Attachment(s)

ILD0007/4881

cc: U.S. EPA - Region V, <u>J.S. Goldstein</u>
IEPA - Springfield, D. Umfleet
Lynn Grills

Lynn Grills Jill Schaller

MIDSTATES WIRE • KEYSTONE STEEL & WIRE • CHICAGO STEEL & WIRE
THE INTEGRATED STEEL AND WIRE FACILITIES OF KEYSTONE CONSOLIDATED INDUSTRIES, INC.

# Daily Analytical Laboratories





Otis E. Michels John P. Higgins Walter H. Johansen Lyn A. Denton Woodrow C. Chenault, Jr. Thomas B. Jordan Philip W. Jacobs

Eugene J. Daily, President

TO: Keystone Steel &	Wire C	ompany	DATE RE	CEIVED	3-30-81	
7000 S. W. Adams	Street		CLIENT	P.O.#	W10008	
Peoria, IL 61641			D/A PRO	OJECT #	5060.10	ı
ATTENTION: Mr. Ken Bi				REPORT	4-29-81	
D/A SAMPLE NO.		1089-02	1089-03	1089-04	1089-05	
SAMPLE DESCRIPTION		Sludge l	Sludge 2	Sludge 3	Sludge 4	
		EP TOXICITY	EP TOXICITY	EP TOXICITY	EP TOXICITY	
SAMPLE DATE	· /•					
Acidity, (as CaCO3)	mg/1					
Alkal., Total, (as CaCO3)	mg/1					
BOD-5, Total	mg/1					
C.O.D.	mg/l					
Dissolved Oxygen	mg/l			<del> </del>	············	! <del> </del>
Nitrogen, Ammonia (as N)						
Oils & Grease pH	mg/1 Units					<del></del>
Solids, Dissolved		_				
Solids, Dissolved	mg/1 mg/1					
Solids, Tot. Suspended Solids, Volatile Sus.	mg/1					
Iron, Total	mg/1		<del></del>			
Coliforms, Total	#/100					
Coliforms, Fecal	#/100					
Fecal Streptococci	#/100					
Lead	mg/1	0.45	0.45	0.45	0.45	
Chrome Chrome, Hex.	mq/l	0.02	0.03	0.02	0.05	
Chrome, Hex.	mq/1	< 0.02	< 0.02	< 0.02	< 0.02	

Analysis and Testing shall be performed in accord with U.S. EPA's current manual of practice or with other procedures acceptable to U.S. EPA and IEPA.

Analysis Certified By:

abbreviated report sheet

## Daily Analytical Laboratories

7807 N. Pioneer Lane • Peoria, Illinois 61615 Tel. 309-692-5252



Eugene J. Daily, Chairman John P. Higgins, President Otis E. Michels, Vice President James F. Dallmeyer Laboratory Director

May 1, 1981

Keystone Steel & Wire Company 7000 S. W. Adams Street Peoria, IL 61641

ATTN: Mr. Dale Bennington

RE: Sludge Lagoon Delisting

Dear Dale:

I am writing you to document the method of collection and analysis of your four sludge samples. Report attached.

Samples were collected by Mr. John LaPayne and Mr. Kurt Stepping on Monday, March 30, 1981. Samples were collected at a depth of 3 to 4 feet from four locations. The first sample was collected near the pipe inlet, about 30 feet from the north side of the lagoon. Subsequent samples were collected at 20 yard intervals, moving east of the inlet pipe.

Samples were extracted in accordance with the Extraction Procedure Toxicity test, described in the May 19, 1980, Federal Register, Part 261, Appendix II. The Leachate was then analyzed for Lead, Total and Hexavalent Chromium. Lead and Total Chrome were analyzed by conventional Flame Atomic Absorption (USEPA Methods Manual). Hexavalent Chrome was analyzed by the Diphenyl-carbizide Method 218.4 (USEPA Methods Manual).

We appreciate this opportunity to extend our services to you. I hope that the above information will meet your requirements. If I may provide any additional information or be of any further service, please call me.

Very truly yours.

DAILY ANALYTICAL LABORATORIES

James F. Dallmeyer Laboratory Director

JFD:djd

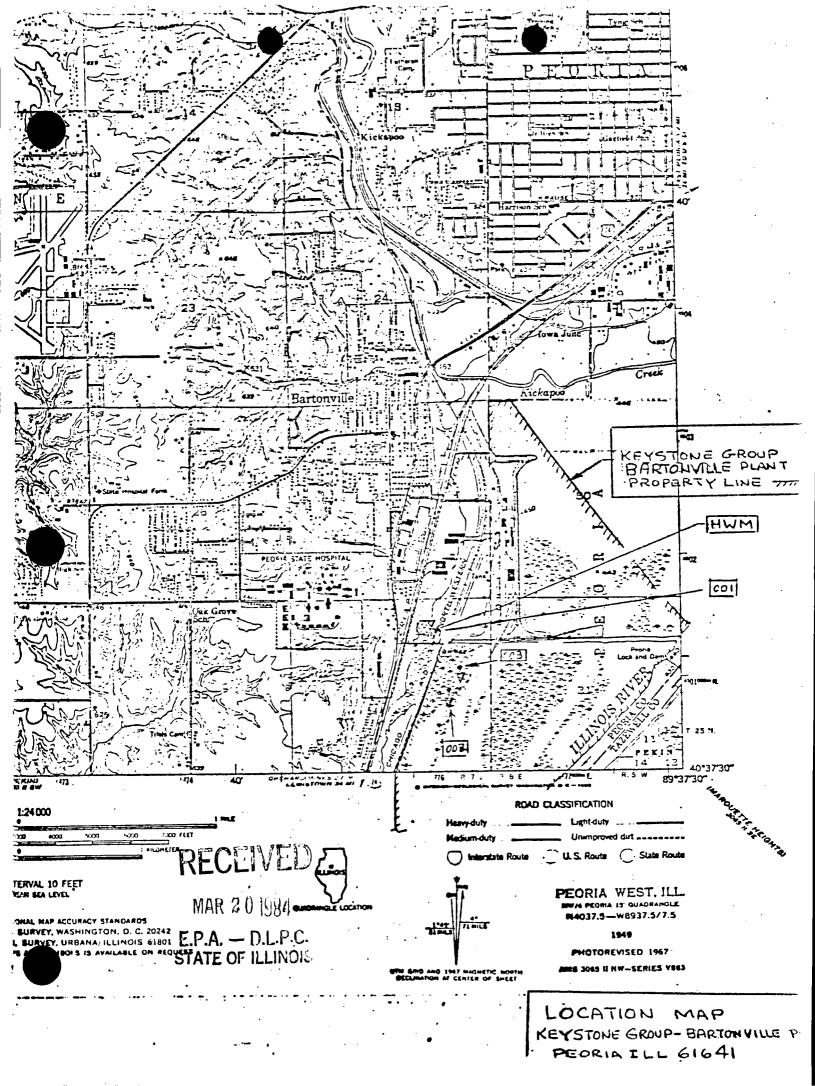
Encl.

ENV. ENG.
DATE WAY A 1981

Trill-in areas are specied for entertype, i.e., 12 characters (inch	o).	Form Angiored OMB Ar 11 11.2						
FORM UVIRG	ONMENTAL PROTECTION AGENCY	EPA I.D. NUMBER						
Co	onsolidated Permits Program	FILD9 9 0 81 7 8 9 2						
I. EPA I.D. NUMBER ILD990817892  CILITY NAME KEYSTONE GROUNDER TOOO S. ADAMS	JP - BARTONVILLE PLANT	If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent (the area to the						
PEORIA, IL 61641  PEORIA, IL 61641								
II. POLLUTANT CHARACTERISTICS	The state of the s							
INSTRUCTIONS: Complete A through J to determine w questions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no" is excluded from permit requirements; see Section C of the	whether you need to submit any permit application ital form listed in the parenthesis following the quest to each question, you need not submit any of these instructions. See also, Section D of the instructions	from, Mark "X" in the box in the third column forms. You may answer "no" if your activity for definitions of bold—faced terms.						
SPECIFIC QUESTIONS	MARK X	JESTIONS MARK X						
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	include a concentrated at	nimal feeding operation or facility which results in a						
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	D. Is this a proposed facility	vill result in a discharge to X   12D)   15   26   27						
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	municipal effluent below	the lowermost stratum con- ter mile of the well bore,						
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface connection with conventional oil or natural gas projection, inject fluids used for enhanced recovery of all or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	X processes such as mir processes such as mir process, solution mining tion of fossil fuel, or reco (FORM 4)	ning of sulfur by the Frasch of minerals, in situ combus- overy of geothermal energy?  X						
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	NOT one of the 28 industriant instructions and which with per year of any air polluta	stationary source which is strial categories listed in the lil potentially emit 250 tons of regulated under the Clean be located in an attainment						
SKIP KEYSTONE GROUP	- BARTONVILLE P	LANT						
IV. FACILITY CONTACT								
A. NAME & TITLE ((ast, f)	I G R. E N V R. E N G R. 30	9 6 9 7 7 5 5 2						
V. FACILITY MAILING ADDRESS								
7 0 0 0 S O U T H A D A M S	STREET							
B. CITY OR TOWN  PEORIA	C.STATE D. ZIP COD	Promise and the second						
VI. FACILITY LOCATION		The Carlo Laboratory						
A STREET, ROUTE NO OR OTHER S	STREET	MAR 20 1984						
O R I A	70	E.P.A. — D.L.P.C. STATE OF ILLINOIS						
C. CITY OR TOWN	D.STATE E. ZIP COD	F. COUNTY CODE						
6 PEORIA	I L 6 1 6 4	1 12 19						
EPA Form 3510-1 (6-80)	•	CONTINUE ON REVER						

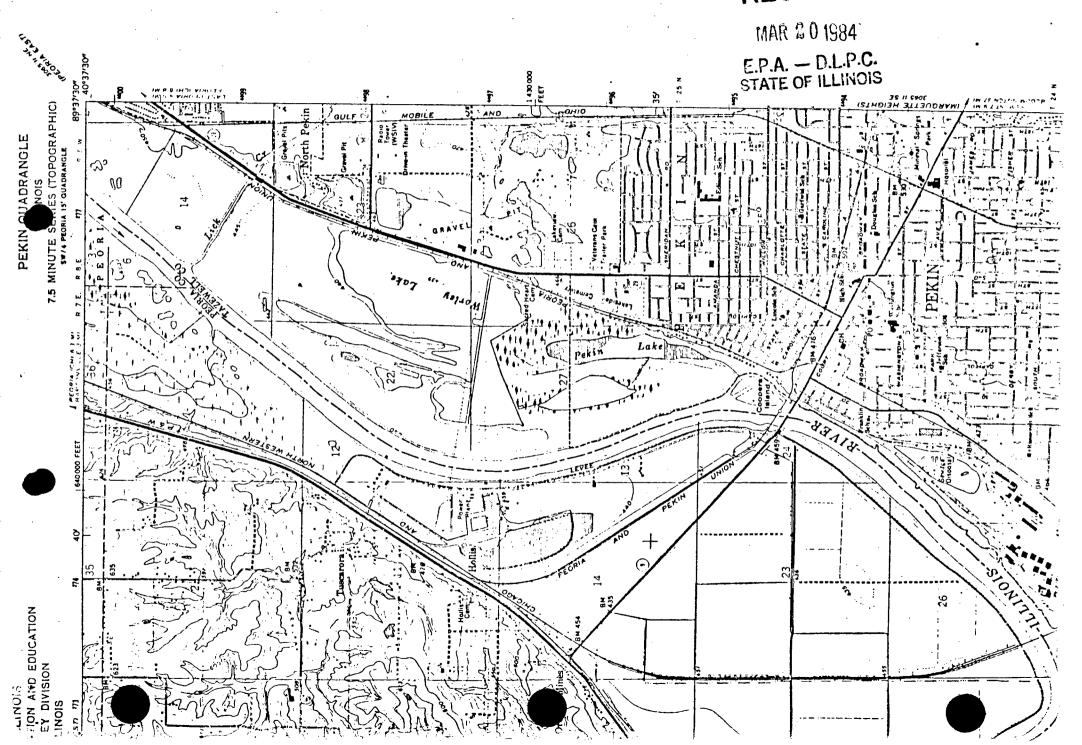
NTINUTO FROM THE FRONT				
M. SIC CODES (4-digit, in order of priority)	Comment and the Continue of th	- Marie de Caracteria de La Caracteria de Ca		- British Michigan
A. FIRST			B. SECOND	
33.1.2 Hot rolled iron and	steel products	7 3.3.1.5 (specify)	irawn carbon ste	el wire.
C. THIRD		15116 191	D. FOURTH	
(specify)		c (specify)		
			an die vink kang die opgestelste gegen eine Gebe	
HATOR INFORMATION	A. NAME		A STATE OF THE STA	යි. Is the name listed i
KEYSTONE GROUP	- BARTON	VILLE PLA	NT	Item VIII-A also the owner?  TYES NO
C. STATUS OF OPERATOR (Enter the appr	opriate letter into the answe	r box; if "Other", specify.)	D. PHONE	(area code & no.)
F = FEDERAL M = PUBLIC (other than f S = STATE O = OTHER (specify) P = PRIVATE	ederal or state) P (SI	pecify)	A 3 0 9	9 7 7 0 2 0
E, STREET OF	R P.O. BOX	<del></del>		
000 SOUTH ADAMS	STREET			
F. CITY OR TOWN	N	G.STATE H. ZIP CO	DE IX. INDIAN LAND	
PEORIA		I 1 6 1 6 4	Is the facility locate	d on Indian lands?
			YES 52	<b>Ж</b> ио
EXISTING ENVIRONMENTAL PERMITS		40 41 42 47 -	A STATE OF THE STA	the state of the s
A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions	from Proposed Sources)	Andrew Control of the	MERCHANICA MINISTRALIA
N I.L.0.0.0.2.5.2.6	9 P			
B. UIC (Underground Injection of Fluids)		(specify)		
	9		specify)	
C. RCRA (Hazardous Wastes)	<del></del>	(specify)		
B	G T 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		specify)	
ttach to this application a topographic map	o of the area extending to	at least one mile beyond	property bounderies.	The map must show
eatment, storage, or disposal facilities, and rater bodies in the map area. See instructions	l each well where it injects for precise requirement	cts fluids underground. In	clude all springs, river	s and other surface
I. NATURE OF BUSINESS (provide a brief descrip		The second second	to be a second second	mile year one of the first
Manufacturing of iron an products.	nd steel inclu	ding semi-tinis	sned and fini	sned wire
			RE(	CENED
		•	MAR	201984
				- D.L.P.C.
II. CERTIFICATION (see instructions)			JIAIC	of Illinois
certify under penalty of law that I have pe ttachments and that, based on my inquiry oplication, I believe that the information is alse information, including the possibility of	v of those persons immo s true, accurate and com fine and imprisonment.	ediately responsible for or	htaining the informati	on contained in the
licholas R. Owens The President of Manufacturing the Group	ig Lim /	echolas R.	Levens "	11-14-80
S FOR OFFICIAL USE ONLY				
				51

Form 3510-1 (6-80) REVERSE





# RECEIVED



1450000 FEET **~02** 40\*37'30"

Creek Sewage Disposal Pond 0 IMARQUETTE HEIGHTSJ 660000 FEET 35' Mapped, edited, and published by the Geological Survey SCALE 1.24 000 Control by USGS and USC&GS Topography by photogrammetric methods from aerial 7000 FEET 1000 6000 photographs taken 1946 and planetable surveys 1948-49 ! KILOMETER Polyconic projection. 1927 North American datum 10,000 foot grid based on Illinois coordinate system, west zone

PEORIA EAST, ILL. N4037.5-W8930/7.5

1949

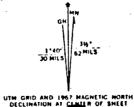
PHOTOREM PHOTOINS AMS 3065 II

1000-moter Universal Transverse Mercator grid ticks, zone 16, shown in blue

Red lint indicates area in which only landmark buildings are shown

Dashed light-blue pattern indicates area subject to infrequent inundation above Fondulac Dam

Revisions shown in purple compiled from aerial photographs taken 1967. This information not field checked Purple tint indicates extension of urban areas



Map photoinspected thanges observed No major culture or d

CONTOUR INTERVAL 10 FEET NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS FOR SALE BY U.S. GEOLOGICAL SURVEY, RESTON, VIRGINIA 22092 AND BY THE STATE GEOLOGICAL SURVEY, URBANA, ILLINOIS 61801 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE

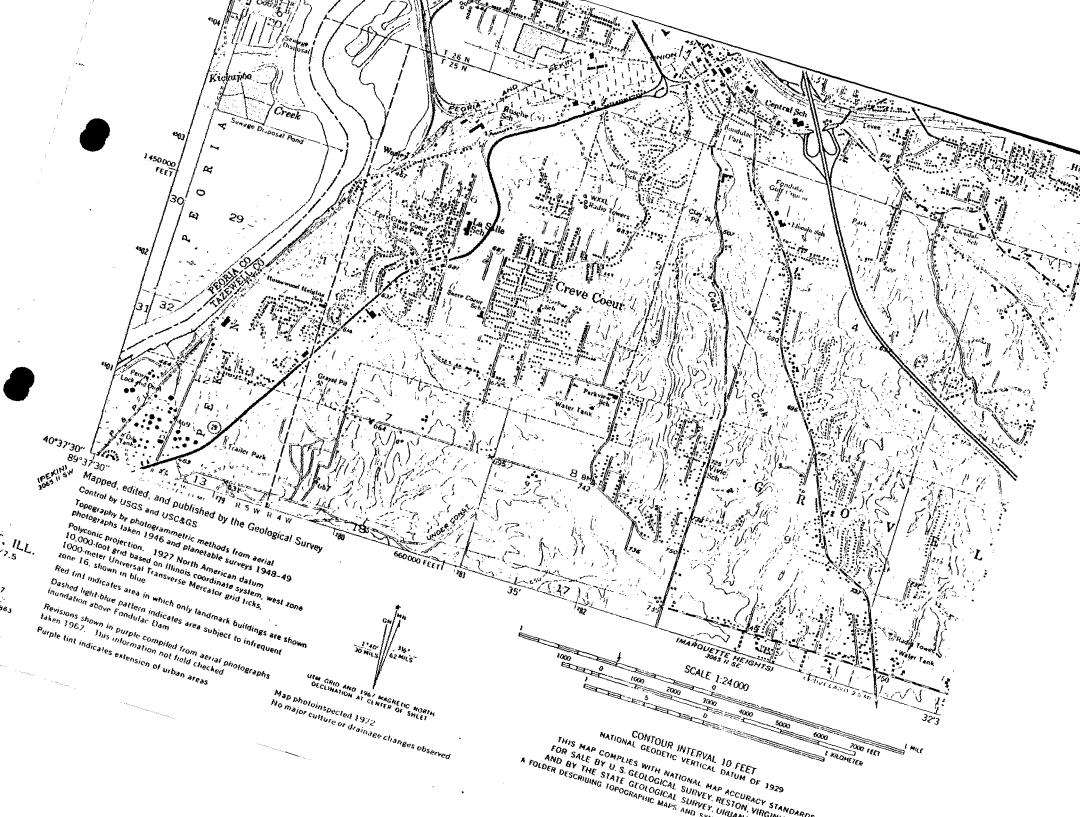
Form Approved OMB No. 158-\$79016

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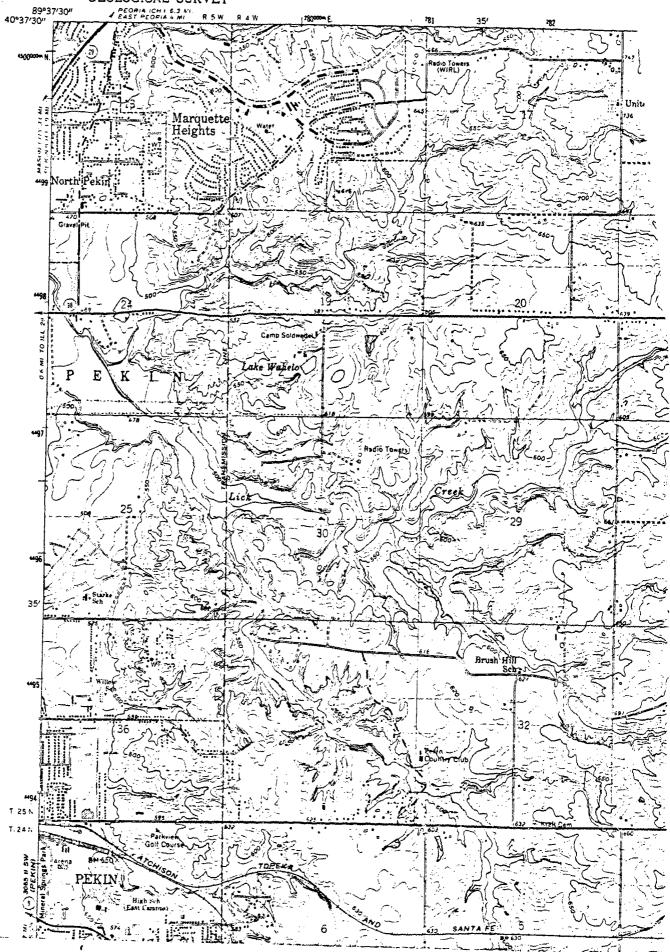
IX DEC	CDIDTION OF HAZ	ARDOUS WASTES	Janutinued from fro		1 1 2	- 13 14 11
A. HAZA	ARDOUS WASTES FRO		URCES. Enter the fou	ır-digit number fron	1 40 CFR Part 261.31 for	each listed hazardous
		2 23 - 26 8 23 - 25 DM SPECIFIC SOURCES or installation handles.			5 11 23 - 26 11 23 - 29	12 12 12 13 - 26 isted hazardous waste from
	13 K 0 6 1 23 26 19 23 26 25 23 26	14 K 0 6 2 23 26 26 26 26 26 27 28 29 20 20 20 21 22 26 26	15 K 0 6 3 23 26 21 23 26 27 23 28	23 - 26 22 28 28 23 - 26	23 - 26 23 23 - 26 29	23 - 26 24 23 - 26 30
stance  D. LISTE	31 31 23 26 37 23 26 43 23 26 DINFECTIOUS WAST	32 32 23 26 38 23 26 44 23 26	rdous waste. Use additional state of the sta	34 23 26 40 23 26 46 23 26 24 27 25 26 26 27 27 27 28 28 28 28 28 28 28 28 28 28 28 28 28	35 23 - 26 41 23 - 26 47 23 - 26 23 - 26 A7	3 for each chemical sub-  3 6  23 - 26  4 2  4 2  4 8  from hospitals, veterinary
E CHAE	49 23 - 26	50 23 - 26 N. LISTED HAZARDO	51	52 23 - 26	53 23 - 26	54
X. CER  I certij attache I beliet	TIFICATION  fy under penalty of documents, and the that the submitte	law that I have pershat based on my ind	CFR Parts 261.21 – 26  CORROSIVE  Sonally examined an pury of those indivite and come and com	d am familiar wit duals immediately	tive  the information sub- tresponsible for obtai	mitted in this and all ning the information, cant penalties for sub-
SIGNATI	de L. B.em	nington	DALE L. BI		erint) - ENGINEERING	August 15, 1980

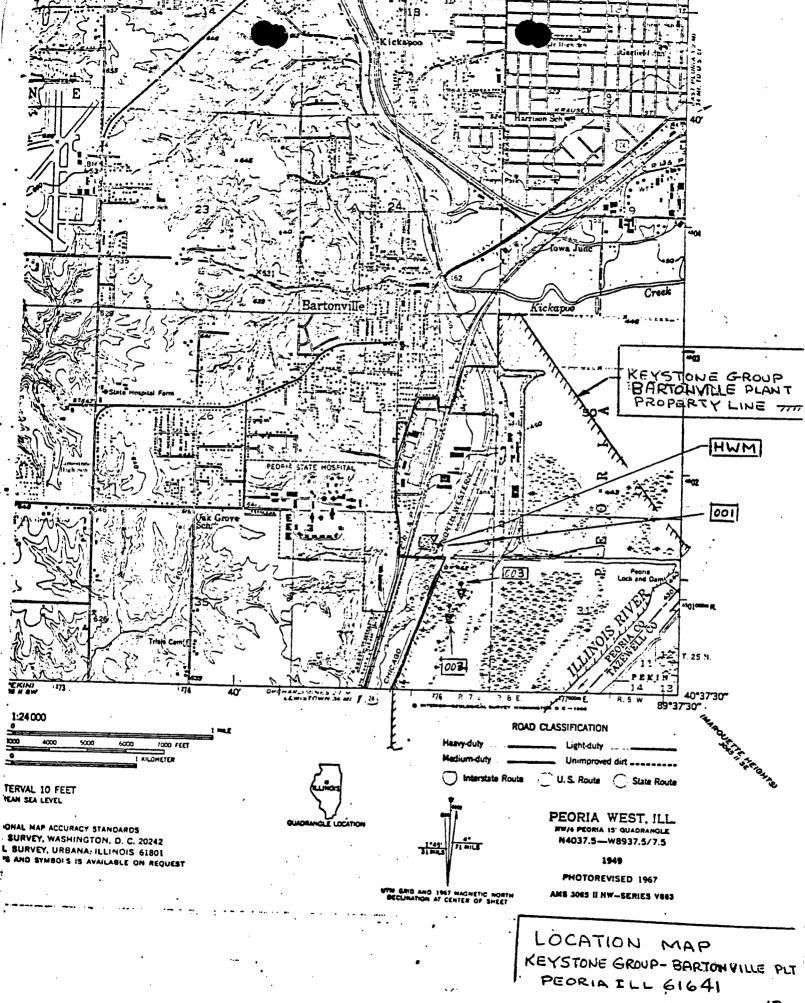
KEYSTONE GROUP

EPA Form 8700-12 (6-80) REVERSE



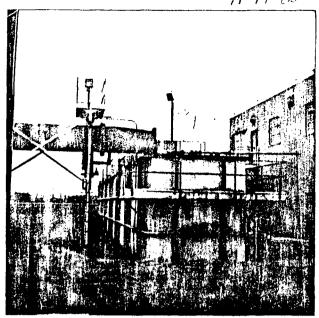
DEPARTMENT GEOL





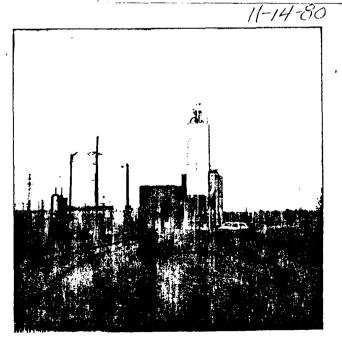


NORTH SLUDGE LAGOON
BARTONVILLE WWTP
LOOKING EAST

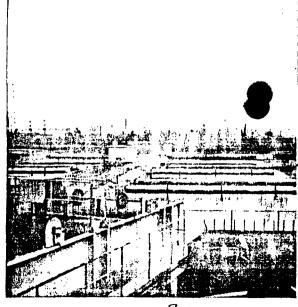


NEUTRALIZATION TANK
BARTONVILLE WINTP
LOOKING EAST

SOUTH SLUDGE LAGOON BARTONVILLE INMITP LOOKING NODTH



BARTONVILLE WINTP BLOG LOOKING ENST



11-14-

SEDIMENTATION BASINIS
BARTON VILLE WWTP
LOOKING EAST

